

ILYARAJA AFFIDAVIT

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DISTRICT

JOYCE ROWLEY,
PLAINTIFF, PRO SE

CASE NO. 21-cv-11649-FDS

V.
CITY OF NEW BEDFORD, MASSACHUSETTS
DEFENDANT

Affidavit of Dr. S Ilayaraja

I, Dr. S Ilayaraja, hereby attest that

1. I have over 19 years' experience in caring for elephants as a veterinarian in India.
2. I am the veterinary officer at Wildlife SOS, a nonprofit organization based in New Delhi, Uttar Pradesh, India, that rescues wounded and injured wildlife, including Asian elephants.
3. In 2018, Wildlife SOS built the Elephant Hospital Campus in Ghari Chumura, Farah, Uttar Pradesh, where we provide veterinary care for rescued elephants. The hospital provides space and equipment not available in the field, such as hoists, digital x-ray machine, ultrasound equipment, a quarantine area, and a laboratory for blood and culture screening.
4. Wildlife SOS has transported and treated 30 elephants in 25 years. Twenty reside at the Elephant Conservation and Care Center in Mathura, Uttar Pradesh.
5. In December 2021, Wildlife SOS rescued three female elephants in serious condition. 'Pari', age 22, was a street begging elephant with severe ankylosis on all four legs. Her condition was so severe, we first estimated her age at 55 years.

6. We transported and are treating an Asian elephant 'Ginger', also a begging elephant, who is blind in both eyes.

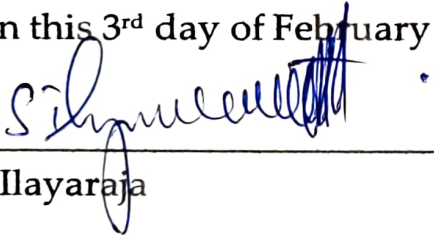
7. The third elephant we transported to our hospital, 'Lakshmi' has severe conformational defects of her back legs and other injuries. It took three days to transport her to ensure her safe arrival.

8. We are willing to consult with Ms. Joyce Rowley on the transport of Asian elephant Ruth, who we understand has leg and foot health issues.

9. Ms. Rowley sent us Ruth's clinical records from September 2021 to December 2021, as well as videos and photographs of Ruth dated in December.

10. We were hoping to review a pre-recorded health assessment video of Ruth so we could better evaluate her condition. Due to the 12 hour time difference between New Delhi and New Bedford, we could not participate in a virtual health assessment.

Sworn this 3rd day of February 2022,



Dr. S Ilayaraja